

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:17CR006
	:	
Plaintiff,	:	
	:	JUDGE JAMES S. GWIN
vs.	:	
BRIAN C. KEELING,	:	<b><u>DEFENDANT BRIAN KEELING'S</u></b>
	:	<b><u>UNOPPOSED MOTION TO</u></b>
Defendant.	:	<b><u>CONTINUE SENTENCING DATE</u></b>

The defendant Brian C. Keeling, through counsel, hereby moves this Honorable Court for an Order continuing the sentencing hearing currently scheduled for May 26, 2017, for 30 days. Assistant United States Attorney Michael Sullivan has no objection to this motion.

On February 13, 2017, Mr. Keeling entered a guilty plea to 1 count of 18 §2251(d)(1)(A) of making a notice seeking/offering to receive, exchange, distribute child pornography and 2 counts of 18 §2252 receipt and distribution and 18 §2252(A) possession of devices with child pornography.

The reason for the request is counsel needs additional time to obtain additional medical records from several medical institutions related to his mental health in order to support a sentencing memorandum. One of the inpatient institutions has closed and

counsel needs additional time to locate important school /medical records. The request for this continuance is made in the interest of justice and not for needless delay.

Therefore, undersigned counsel, respectfully requests this Honorable Court grant a continuance of the sentencing hearing, for 30 days.

Respectfully submitted,

STEPHEN C. NEWMAN  
Federal Public Defender  
Ohio Bar: 0051928

s/ JACQUELINE A. JOHNSON  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2017, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

s/ JACQUELINE A. JOHNSON  
JACQUELINE A. JOHNSON  
First Assistant  
Federal Public Defender